

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CASE NO. 3:16-cv-00695-GCM**

BARONIUS PRESS, LTD.,

Plaintiff,

v.

SAINT BENEDICT PRESS LLC,

Defendant.

**DEFENDANT SAINT BENEDICT  
PRESS, LLC'S SECOND MOTION  
FOR EXTENSION OF TIME TO  
ANSWER, PLEAD OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

Defendant Saint Benedict Press, LLC, pursuant to Rule 6 of the Federal Rules of Civil Procedure, respectfully moves the Court for an additional extension of time of twenty-one (21) days, up to and including December 22, 2016, within which to answer, plead or otherwise respond to Plaintiff's Complaint. In support of this motion, Defendant shows the following:

1. Defendant Saint Benedict Press, LLC was served with a copy of the Complaint by certified mail on October 11, 2016;
2. Defendant Saint Benedict Press, LLC filed a Motion for Extension of Time to Answer, Plead or Otherwise Respond to Plaintiff's Complaint on October 28, 2016 (Doc. 11);
3. Defendant Saint Benedict Press, LLC's Motion for Extension of Time to Answer, Plead or Otherwise Respond to Plaintiff's Complaint was granted by Order of this Court on October 31, 2016 (Doc. 13);
4. The time within which to answer, plead or otherwise respond to Plaintiff's Complaint has not yet expired;

5. Counsel is in need of additional time to conduct additional research into this matter prior to answering, pleading or otherwise responding to Plaintiff's Complaint as it involves complex factual issues;

6. Pursuant to Local Rule 7.1(B) Defendant has conferred with opposing counsel and opposing counsel has consented to this motion; and

7. This motion is made for good cause and not for purposes of undue delay.

WHEREFORE, Defendant Saint Benedict Press, LLC respectfully requests that the Court grant it an additional twenty-one (21) day extension of time through and including December 22, 2016, within which to answer, plead or otherwise respond to Plaintiff's Complaint.

This the 23rd day of November, 2016.

/s/ Jonathan E. Buchan

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Natalie D. Potter, N.C. State Bar No. 34574

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**CERTIFICATE OF SERVICE**

On November 23, 2016, I electronically filed this document through the CM/ECF system,  
which will send a notice of electronic filing to:

Mark W. Ishman  
Ishman Law Firm, P.C.  
[mishman@ishmanlaw.com](mailto:mishman@ishmanlaw.com)

This the 23<sup>rd</sup> day of November, 2016.

/s/ Jonathan E. Buchan  
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